BC Securities Commission
Invest Right

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Citation: 2026 BCSECCOM 93

Settlement Agreement

Andrew Pollard

***Securities Act*, RSBC 1996, c. 418**

¶ 1 The Executive Director of the British Columbia Securities Commission (the Executive Director) and Andrew Pollard (Mr. Pollard) agree as follows:

Agreed Statement of Facts

Overview

1. Mr. Pollard did not disclose some of his trades and shareholdings accurately on the System for Electronic Disclosure by Insiders (SEDI) within the time required. However, Mr. Pollard subsequently made the required filings, self-reported his misconduct to the Executive Director, and took remedial action, all before Staff had begun any investigation of his insider reporting.

Background

2. Mr. Pollard is a resident of British Columbia.

3. He was president, CEO, and a director of Blackrock Silver Corp. (the Issuer) at all material times between July 26, 2019 and June 25, 2025 (the Review Period).

4. The Issuer is a junior mineral exploration company, with its shares listed on the TSX Venture Exchange and Frankfurt exchange and quoted on the United States over-the-counter markets.

5. As a director or officer of the Issuer, Mr. Pollard is an insider under section 1(1) of the Act and, as a director and the Chief Executive Officer of the Issuer, Mr. Pollard is a reporting insider under section 1.1(1) of National Instrument 55-104 *Insider Reporting Requirements and Exemptions* (NI 55-104).

Misconduct

6. As an insider, Mr. Pollard was required, under section 87(2) of the Act, to file reports disclosing his ownership of the Issuer's securities, in accordance with the regulations.

7. Specifically, he was required to file insider reports on SEDI within five days of changes to his beneficial ownership of, or control or direction over, the Issuer's securities, as required by section 3.3 of NI 55-104 (the 5-Day Deadline).

8. During the Review Period, Mr. Pollard engaged in 268 transactions involving the Issuer's securities that were required to be reported on SEDI, involving a total of 14,821,067 shares with a combined value (either the acquisition cost or proceeds of sale) of $3,965,548.

9. Of those transactions, Mr. Pollard did not report 161 transactions, involving 3,604,582 securities valued at $951,090, within the 5-Day Deadline

Factors Relevant to Settlement

10. Mr. Pollard subsequently made all the required filings on SEDI and self-reported his failures from the Review Period on August 13, 2025.

11. Mr. Pollard initiated contact with Staff citing BC Notice 15-701 *Credit for Cooperation in Enforcement Matters.*

12. Mr. Pollard has paid late fees of $5,700 and fully cooperated with Staff.

13. Unprompted by Staff, Mr. Pollard also completed a course of study on the duties and responsibilities of directors and officers of public companies.

14. Mr. Pollard has no disciplinary history and he was not previously an insider of a reporting issuer before becoming an insider of the Issuer.

Undertaking(s)

15. Mr. Pollard undertakes to pay $25,000 to the British Columbia Securities Commission in respect of settlement of this matter which sum is due and payable immediately without further demand.

Waiver

¶ 2 Mr. Pollard waives any right he may have, under the Act or otherwise, to a hearing, hearing and review, judicial review or appeal related to, in connection with, or incidental to this settlement.

Counterpart

¶ 3 This Settlement Agreement may be signed in counterpart and all such counterparts of signed copies, whether delivered electronically or otherwise, shall be read or construed together as if they formed one originally executed document.

¶ 4 March 31, 2026

¶ 5 _____*Andrew Pollard*_________________
Andrew Pollard

_____*Redacted*______________________)
Witness Signature)
_____*Redacted*______________________)
Witness Name (please print))
_____*Redacted*______________________)
_____*Redacted*______________________)
Address)
_____*Redacted*______________________)
Occupation)

Doug Muir
4/10/2026 | 10:14 AM PDT

¶ 6 Douglas B. Muir
Director, Enforcement